

**OBJECTION DEADLINE: June 20, 2016 at 4:00 p.m. (Eastern Time)**  
**HEARING DATE AND TIME: June 27, 2016 at 11:00 a.m. (Eastern Time)**

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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re	: Chapter 11
	:
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	: Case No.: 09-50026 (MG)
f/k/a General Motors Corp., <i>et al.</i>	:
	:
Debtors.	: (Jointly Administered)
	:
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**COMPENDIUM OF EXHIBITS FOR MOTION BY GENERAL MOTORS LLC  
PURSUANT TO 11 U.S.C. §§ 105 AND 363 TO ENFORCE THE BANKRUPTCY  
COURT'S JULY 5, 2009 SALE ORDER AND INJUNCTION,  
AND THE RULINGS IN CONNECTION THEREWITH**

**VERONICA ALAINE FOX  
CLAUDIA LEMUS  
TAMMIE CHAPMAN  
CONSTANCE HAYNES-TIBBETTS**

**Index of Exhibits**

<b>Exhibit</b>	<b>Description</b>
A.	<i>Order (i) Authorizing Sale of Assets Pursuant to Amended and Restated Master Sale and Purchase Agreement with NGMCO, Inc., a U.S. Treasury-Sponsored Purchaser; (ii) Authorizing Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with the Sale; and (iii) Granting Related Relief, entered by the Bankruptcy Court on July 5, 2009 (including the Amended and Restated Master Sale and Purchase Agreement (and all amendments))</i> [ECF No. 2968]
B.	Complaint, <i>Fox v. General Motors LLC and Atlanta Auto Brokers, Inc.</i> , Case No.: 14A 3468-4 (Cobb County, GA)
C.	Complaint, <i>Lemus v. General Motors LLC, et al.</i> , Case No.: D-101-CV-2013-03270 (1st Jud. Dist., Santa Fe Cty., NM)
D.	Complaint, <i>Chapman v. General Motors LLC, et al.</i> , Case No.: 60-CV-2015-3292 (Cir. Ct. of Pulaski Cty., AK)
E.	Complaint, <i>Tibbetts v. General Motors LLC, et al.</i> , Case No.: D-202-CV-2015-04918 (Dist. Ct., Bernalillo Cty., NM)
F.	<i>Judgment</i> , entered by the Bankruptcy Court, on June 1, 2015 [ECF No. 13177]
G.	<i>Judgment</i> , entered by the Bankruptcy Court on Dec. 4, 2015 [ECF No. 13563]
H.	<i>Case Management Order Re No-Strike, No-Stay, Objection, and GUC Trust Asset Pleadings</i> , entered by the Bankruptcy Court on Aug. 19, 2015 [ECF No. 13383]
I.	<i>Scheduling Order Regarding Case Management Order Re: No-Strike, No Stay, Objection, and GUC Trust Asset Pleading</i> , entered by the Bankruptcy Court on Sept. 3, 2015 [ECF No. 13416]
J.	<i>Letter from New GM to Counsel for Fox Plaintiff</i> , dated Sept. 4, 2015 (without exhibits)
K.	<i>Letter from Counsel for Fox Plaintiff to New GM</i> , dated Sept. 9, 2015
L.	<i>Email Correspondence between New GM and Counsel for Fox Plaintiff</i> , dated Sept. 11, 2015

M.	<p>Certificate of Service for <i>Opening Brief by General Motors LLC with Respect to Whether Plaintiffs May Seek Punitive Damages from General Motors LLC Based on the Conduct of General Motors Corporation (with Exhibit)</i>, filed on Sept. 16, 2015 [ECF No. 13440]</p> <p>Certificate of Service for <i>Opening Brief by General Motors LLC with Respect to Whether Plaintiffs Can Automatically Impute to New GM Knowledge of the Events that Took Place at Old GM and/or as Reflected in Old GM'S Books and Records</i>, filed on Sept. 21, 2015 [ECF No. 13457]</p> <p>Certificate of Service for <i>New GM Bellwether Letter, with Marked Bellwether Complaints, Pursuant to Scheduling Order dated September 3, 2015 (with Exhibits)</i>, filed on Sept. 22, 2015 [ECF No. 13464]</p> <p>Certificate of Service for <i>Reply Brief by General Motors LLC with Respect to Whether Plaintiffs May Seek Punitive Damages From General Motors LLC Based On The Conduct Of General Motors Corporation</i>, filed on Sept. 23, 2015 [ECF No. 13467]</p> <p>Certificate of Service for <i>Letter Filed on Behalf of General Motors LLC Regarding Other Plaintiffs' Complaints (with Exhibits)</i>, filed on Sept. 24, 2015 [ECF No. 13468]</p> <p>Certificate of Service for <i>Reply Brief by General Motors LLC with Respect to Whether Plaintiffs Can Automatically Impute to New GM Knowledge of the Events that Took Place at Old GM and/or as Reflected in Old GM'S Books and Records</i>, filed on Oct. 1, 2015 [ECF No. 13485]</p>
N.	<i>Email Correspondence between New GM and Counsel for Fox Plaintiff</i> , dated Sept. 23-28, 2015
O.	Compilation of Correspondence between New GM and Counsel for Fox Plaintiff in May 2016
P.	<p><i>Letter from New GM to Counsel for Chapman</i>, dated Sept. 1, 2015 (without exhibits)</p> <p><i>Letter from New GM to Counsel for Tibbetts</i>, dated Aug. 26, 2015 (without exhibits)</p> <p><i>Letter from New GM to Counsel for Lemus</i>, dated Aug. 31, 2015 (without exhibits)</p>
Q.	<i>Letter from Counsel for Turner Plaintiffs to New GM</i> , dated Sept. 2, 2015
R.	<i>Email from New GM to Counsel for Turner Plaintiffs</i> , dated Sept. 11, 2015
S.	Compilation of Correspondence between New GM and Counsel for Turner Plaintiffs in May 2016

T.	Marked Up Version of: Complaint, <i>Fox v. General Motors LLC and Atlanta Auto Brokers, Inc.</i> , Case No.: 14A 3468-4 (Cobb County, GA)
U.	Marked Up Version of: Complaint, <i>Lemus v. General Motors LLC, et al.</i> , Case No.: D-101-CV-2013-03270 (1st Jud. Dist., Santa Fe Cty., NM)
V.	Marked Up Version of: Complaint, <i>Chapman v. General Motors LLC, et al.</i> , Case No.: 60-CV-2015-3292 (Cir. Ct. of Pulaski Cty., AK)
W.	Marked Up Version of: Complaint, <i>Tibbetts v. General Motors LLC, et al.</i> , Case No.: D-202-CV-2015-04918 (Dist. Ct., Bernalillo Cty., NM)
X.	Proposed Order (with Exhibits)